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July 16, 2018

Honorable Norman A. Mordue Senior United States District Court Judge 100 South Clinton Street Syracuse, New York 13202

RE: UNITED STATES v. KAMAR BOATMAN, CASE NO.: 5:18-MJ-0299

Dear Judge Mordue:

cc:

Pursuant to the Court's Criminal Pretrial Scheduling Order, motions in this case must be filed on or before July 19, 2018. (Dkt. No. 16.) The defense is considering filing a motion to suppress. The defense has spoken to numerous witnesses. One key witness, however, will not speak to defense counsel unless her own attorney is present. I have written to the witness' attorney to request a meeting, but the meeting has not yet been scheduled.

In light of the foregoing, the defense requests an extension of thirty days in which to file motions. Richard Southwick, who is representing the government in this matter, indicates that he has no objection to such an extension.

Thank you for your consideration. Please let me know if the Court has any questions or concerns.

Very truly yours,

OFFICE OF THE FEDERAL PUBLIC DEFENDER

s/ Courtenay K. McKeon

By: Courtenay K. McKeon, Esq.
Assistant Federal Public Defender

Richard Southwick, AUSA (by ECF); Kamar Boatman, Delaware County Jail